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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO;  
AMERICAN FEDERATION OF STATE  
COUNTY AND MUNICIPAL EMPLOYEES,  
AFL-CIO, et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**PLAINTIFFS' CORRECTED  
NOTICE OF DEPOSITION OF  
TRACEY THERIT**

## **NOTICE OF DEPOSITION**

**PLEASE TAKE NOTICE** that, pursuant to Orders of the U.S District Court for the Northern District of California in the above-captioned case and Federal Rule of Civil Procedure 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Department of Veterans Affairs Chief Human Capital Officer Tracey Therit on **March 31, 2025** at **1:00 pm EST** at 805 15th Street, NW Ste 1000, Washington, DC 20005. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Tracey Therit by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial

1 DATED: March 20, 2025

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7 By: /s/ Danielle Leonard

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15 *Attorneys for Plaintiff State of Washington*

## PROOF OF SERVICE

I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300, San Francisco, California 94108. On March 20, 2025, I served the following document(s):

**PLAINTIFFS' CORRECTED NOTICE OF DEPOSITION OF TRACEY  
THERIT**

on the parties, through their attorneys of record, as designated below:

**By Electronic Service:** By Email, I caused such document(s) to be served via electronic mail on the parties in this action by transmitting true and correct copies to the following email address(es):

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 20, 2025, at San Francisco, California.

/s/ Giorgia Lingiardi  
Giorgia Lingiardi